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April 14, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: MB Docket No. 12-217

Dear Ms. Dortch:

On April 12, 2017, Andy Scott, Vice President, Engineering, and the undersigned, of NCTA - The Internet & Television Association, met with the following Media Bureau staff: Michelle Carey; Martha Heller; Mary Beth Murphy; Brendan Murray; Jeffrey Neumann; John Wong; and Sean Yun. We discussed NCTA's written comments in the above-captioned proceeding.

We explained that cable operators for many years have designed their digital systems to comply with SCTE 40, but that certain elements of that standard would not be appropriate for inclusion in any Commission rule regarding digital technical standards.¹ We also described how operators use a variety of methods to monitor digital signal quality on an on-going basis. NCTA maintained that FCC-mandated digital proof-of-performance testing would be burdensome and costly and should not be adopted.

In addition, consistent with our written comments,² we proposed that the Commission maintain flexibility so that operators can demonstrate compliance with the FCC's signal leakage rules without needing to invest in additional testing equipment.

¹ Comments of the National Cable & Telecommunications Association, *In the Matter of Cable Television Technical and Operational Requirements*, MB Docket No. 12-217 (filed Dec. 10, 2012) at 8-10 and Attachment A.

² *Id.* at 18-23.

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Finally, we described voluntary measures undertaken by the cable industry, including educational efforts and development of best practices, to help solve any leakage issues that may occur in the UHF spectrum. Accordingly, no new leakage rules are warranted.

Respectfully submitted,

/s/ Diane B. Burstein

Diane B. Burstein

cc: Michelle Carey
Martha Heller
Mary Beth Murphy
Brendan Murray
Jeffrey Neumann
John Wong
Sean Yun